

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA

v.

MICHAEL WRIGHT

*** CRIMINAL NO: 09-103**

*** SECTION: "N"**

*** VIOLATION: 18 U.S.C. § 2252(a)(4)(B)
18 U.S.C. § 2253**

*** * ***

F A C T U A L B A S I S

Should this matter proceed to trial, both the government and the defendant, **MICHAEL WRIGHT**, do hereby stipulate and agree that the following facts set forth a sufficient factual basis for the crime to which the defendant is pleading guilty and that the government would prove the following beyond a reasonable doubt at trial:

The government would show that at all times mentioned in the Bill of Information, the defendant, **MICHAEL WRIGHT**, was a resident of the Eastern District of Louisiana, living in New Orleans, Louisiana.

The government would present evidence that on or about March 26, 2009, Special Agents from the U. S. Department of Homeland Security, Immigration and Customs Enforcement (ICE), executed a federal search warrant, based on probable cause, for the defendant's Nashville Avenue

home located in New Orleans, Louisiana. Agents would testify that they recovered 2 computers and approximately 35 CDs from the defendant's residence.

The government would establish through testimony and documentary evidence that **MICHAEL WRIGHT** knowingly used his computer to search for, download, and save images of child pornography. Further, the evidence and testimony would establish that a computer forensic search of **MICHAEL WRIGHT's** seized computer and related evidence revealed approximately 30,000 images and videos depicting the sexual victimization of children. In addition, ICE Agents would introduce email receipts found in **WRIGHT's** residence confirming his subscription to child pornography websites.

Further, the government would introduce through ICE agents statements wherein **MICHAEL WRIGHT** voluntarily admitted to federal agents that he knowingly downloaded images of child pornography to his computer. According to **WRIGHT**, he purchased subscriptions to child pornography websites on two occasions. The first subscription was approximately three years ago. **WRIGHT** said he also viewed images of child pornography on free websites. In addition, **WRIGHT** was shown two video clips of child pornography recovered by ICE agents. The first video was of a prepubescent girl masturbating to which **WRIGHT** told the agents he believed the minor to be "about ten" years old. The second video found by ICE agents at **WRIGHT's** residence depicted a prepubescent girl in a sexual act to which **WRIGHT** told ICE agents that he believed the girl to be "too young, about six" years old.

Forensic evidence consisting of medical testimony, law enforcement officers, and supporting documentation would establish that some of the child victims depicted in the images possessed by

WRIGHT were of real, identifiable victims, less than the age of eighteen (18) at the time the child pornography was created.

_____ Testimony would establish that some of the child victims depicted in the materials possessed by **MICHAEL WRIGHT** were of prepubescent children less than 18 years of age; to wit: less than twelve (12) years old and that the images of the child victims were engaged in “sexually explicit conduct” as defined in Title 18, United States Code, Section 2256. These images included pictures of adult males vaginally and/or anally penetrating minor victims and minors performing oral sex on adults. All of the images of child pornography possessed by the defendant, would be introduced through the testimony of ICE agents.

Further, the government would present evidence that would establish that the images of child pornography had been transported in interstate and foreign commerce via computer.

Further, the government would show through testimony and documentary evidence that the equipment used by the defendant to acquire the child pornography was transported in interstate or foreign commerce.

MICHAEL WRIGHT
Defendant

DATE

ROMA KENT
Counsel for Defendant

DATE

BRIAN M. KLEBBA
Assistant United States Attorney

DATE